

June 29, 2009
via electronic filing

Ms. Rosa G. Lewis
Senior Campaign Finance Analyst
Reports Analysis Division
Federal Election Commission
Washington, D.C. 20463

Re: SEIU COPE Amended October Monthly Report (9/01/08-9/30/08), received 10/31/08

Dear Ms. Lewis:

This is in response to your letter to SEIU COPE, dated May 29, 2009. In your letter, you ask seven questions regarding the above referenced Monthly Report.

- 1) The amended report added debt obligations on Line 10 for four expenditures that had been reported on 48hr notices during the period but had not yet been paid. These items were erroneously included as expenditures on the original monthly report even though they had not been paid yet. The amended report corrected this by establishing a debt obligation on Schedule D and showing the expense as a memo item on Schedule E. One of the items was not marked as a memo item on the amended report but this will be corrected on the amended report we will be filing.
- 2) On October 31, 2008 we filed amendments for 5 of the monthly reports previously filed in 2008 in order to respond to issues raised in four Requests for Additional Information received from the Commission in September 2008, as well as the changes that needed to flow through to subsequent periods from those changes, and further review of our records. The amended October Monthly report filed 10/31/08 was a complete, not a partial report. All activities included in the original report were reported in the amendment, but some disbursements associated with those activities were excluded from the amended report because they had been double counted or mis-stated in the original report.
- 3) We are filing another amended October Monthly report that will itemize and clarify the expenditures for the activity reported on the 48 hr notices that you inquired about.
- 4) The amended report we will be filing will modify the expenditures described as ?canvass staff and expenses? to clarify that they were payments for ?door-to-door voter ID and get out the vote efforts?.
- 5) The payments to individuals for travel disclosed on Schedule B were not made to any committee staff, but rather were contributions to defray the travel costs of SEIU members or officers who attended the Democratic National Convention as delegates and we believe have been properly reported as operating expenses on Line 21
- 6) The amended report we are filing will clarify the expenditures made to the SEIU (General Fund) and how they correspond to the various 48hr notices filed during the period.
- 7) The expenditures in this report that were described as for ?video production for future use,? were not for communications containing express advocacy. They were made for stock footage that might be used in future communications to SEIU members and/or the general public but were not part of any specific independent expenditures being made and thus were correctly included on the report Line 21. The expenditures in this report that were described as for ?media consulting? and ?polling, not for specific IE? were not for communications containing express advocacy. They were made for general research and advice on communications and voter attitudes and thus were correctly included on the report Line 21.
